

Abdul Hassan Law Group, PLLC
215-28 Hillside Avenue
Queens Village, New York, 11427

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**Abdul K. Hassan, Esq.**  
Email: [abdul@abdulhassan.com](mailto:abdul@abdulhassan.com)  
***Employment and Labor Lawyer***

Tel: 718-740-1000  
Fax: 718-740-2000  
Web: [www.abdulhassan.com](http://www.abdulhassan.com)

**November 5, 2023**

**Via ECF**

Hon. Mary Kay Vyskocil, USDJ  
United States District Court, SDNY  
500 Pearl Street,  
New York, NY 10007-1312

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| USDC SDNY<br>DOCUMENT<br>ELECTRONICALLY FILED<br>DOC #:<br>DATE FILED: 11/6/2023 |
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**Re: Harris v. F. Schumacher & Co., LLC**

**Case #: 23-CV-05676 (MKV)(SDA)**

**Motion for Extension of Time**

Dear Judge Vyskocil:

My firm represents plaintiff in the above-referenced action, and I respectfully write to request a 30-day extension of the November 14, 2023 deadline for Plaintiff to file her response to Defendant's Motion to Dismiss - if the Court chooses to refer the case to mediation, a date two weeks after the completion of mediation is requested as the new deadline for Plaintiff to file her response to Defendant's motion. This request is being made because of the workload and scheduling demands of Plaintiff's counsel, including many all-day mediations. I reached out to defense counsel for his position on this request, but his auto reply said he was out of the office with limited access to email. No prior request for an extension of this deadline was made. A corresponding 30-day extension of the November 21, 2023, deadline for Defendant's reply, if any, is also requested. No appearances or deadlines will be affected by this request.

I thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC


/s/ Abdul Hassan

By: Abdul K. Hassan, Esq.

**cc: Defense Counsel via ECF**

**Plaintiff is GRANTED a 30-day extension of the November 14, 2023 deadline. Plaintiff's opposition brief must be filed on or before December 14, 2023. Any reply brief must be filed on or before December 21, 2023. SO ORDERED.**

Date: 11/6/2023  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge